

UNITED STATES DISTRICT COURT

for the

Western District of Louisiana



United States of America

v.

Gjamale Demonte Kaver

Case No. 1:22-MJ-00026

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ in the county of _____ Vernon _____ in the
Western District of Louisiana, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2241(c)

Aggravated sexual abuse of a minor under the age of 12

This criminal complaint is based on these facts:

Please see attached affivvit

☐ Continued on the attached sheet.


Complainant's signature
Zachary Thomas, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: February 14, 2022


Judge's signature

City and state: Alexandria, LA 71301

Joseph H.L. Perez-Montes, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Zachary Thomas, being first duly sworn, depose and state the following:

1. I am a Special agent (SA) with the Federal Bureau of Investigation ("FBI"). I have been so employed since January 6, 2019. I am currently assigned to the FBI's New Orleans Division at the Alexandria Resident Agency, Alexandria, Louisiana. I am presently assigned to investigate violent crimes and crimes on government reservations. I have received extensive training in methods of proof utilized in the investigation and prosecution of federal crimes to include twenty-one (21) weeks of training at the FBI Academy in Quantico, Virginia. In the course of my official duties as a Special Agent, I have participated in the execution of numerous federal search and arrest warrants. I am responsible for, among other things, investigating violations of federal law that occur within the special maritime and territorial jurisdiction of the United States.

2. This affidavit is made in support of a complaint charging GJAMALE DEMONTE KAVAR, with aggravated sexual abuse of a minor under the age of 12, in violation of Title 18, United States Code, Section 2241(c).

3. The information contained within this affidavit is based upon my training and experience, my personal knowledge of the investigation conducted in the matter, and information provided by other agents and law enforcement officials, who have assisted in this investigation and their own investigation. This affidavit is intended to provide probable cause to support the issuance of the complaint as

requested herein and does not purport to set forth all of the information that I have acquired during the course of this investigation.

OVERVIEW OF INVESTIGATION

4. On July 6, 2020, SA Henry Beecher, Fort Sill US Army Criminal Investigation Command (CID), was notified by Dr. Stephen P. Gontz, Criminal Intelligence Analyst, Fort Sill, OK, 73503 (FSOK), that victim identified as S.D., born XX-XX-1999, reported she was molested by former PFC GJAMALE KAVER (KAVER), XXX-XX-9594, born XX-XX-1983, from 2007 through 2009, while they lived on post at Fort Polk, LA (FPLA); Fort Riley, KS (FRKS); and Fort Bragg, NC (FBNC).

5. S.D. advised SA Beecher that she was contacted by Detective Megan Reinhart, Wilmington Police, Wilmington, North Carolina (NC) (WPD). S.D. said Detective Reinhart was investigating KAVER for similar offenses in NC and wanted to determine if S.D. was a victim of sexual crimes committed by KAVER. S.D. advised Detective Reinhart she was a victim of sexual abuse by KAVER. S.D. then contacted the Fort Sill CID Office to report the incidents. S.D. resides in Oklahoma and the Fort Sill CID Office was the closest Army post to her. S.D. advised CID agents when she was between the ages of 9 and 12, KAVER, her then stepfather, touched her inappropriately and committed sexual acts on numerous occasions. S.D. stated the incidents occurred between 2007-2009, while they lived on-post at FPLA; FRKS; and

FBNC, when KAVER was on active duty in the U.S. Army. S.D. stated KAVER would come into her room at night and pull her pants down and touch her vagina.


6. S.D. advised KAVER would regularly go into the bathroom when S.D. was showering, open the curtain and watch her bath. S.D. advised on another occasion, KAVER came into her bedroom at night, pulled S.D.'s pants down and rubbed his penis against her buttocks. KAVER covered her mouth so she could not scream. S.D. advised on another occasion, the night before KAVER deployed, KAVER persuaded S.D. to sit next to him on a couch. KAVER then reached under S.D.'s shirt, fondled her breast, and digitally penetrated S.D.'s vagina up to the first knuckle of his finger. S.D. advised she was sexually abused by KAVER over 100 occasions.

7. CID agents conducted a review of KAVER's Enlisted Records Brief (ERB) and corroborated he was assigned to FPLA, FRKS, and FBNC, during the times S.D. reported the incidents occurred. A review of KAVER's DD Form 214 identified KAVER received a Chapter 14-12c (Misconduct) discharge, General-Under Honorable Conditions on June 28, 2012.

8. On September 9, 2020, Detective Reinhart conducted an audio/video recorded interview of KAVER who was advised of his rights. KAVER made admissions of touching S.D.'s vagina, breast, and buttocks starting when she was 7 or 8 years old. KAVER stated the touching occurred in Louisiana. Detective Reinhart asked KAVER if the touching continued when the family moved to Kansas, and KAVER nodded his head up and down.

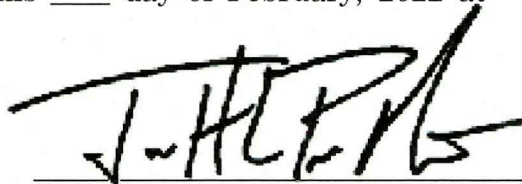
CONCLUSION

9. Based on the foregoing facts and my training, education, and experience, there is probable cause to believe that GJAMALE KAVER did engage in the aggravated sexual abuse of a child under the age 12, in violations of Title 18, United States Code, Section 2241(c).



ZACHARY THOMAS, Special Agent
Federal Bureau of Investigation

Subscribed and sworn before me this 14th day of February, 2022 at
Alexandria, Louisiana.



Honorable Joseph H.L. Perez-Montes
United States Magistrate Judge
Western District of Louisiana